

AT&T  
TCG

Please answer the following questions:

1. When this issue was first discovered? **2/2002**
2. How many occurrences and approximately over how long a period of time?  
**Monthly occurrence since 2002**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **Faulty CLEC billing system/process.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. **The back billing clause and the applicable rate elements are contract issues, but the number of circuits the CLEC charges SBC should not be an interpretation issue.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Low**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Each month that SBC receives an invoice with inappropriate charges, in accordance with the Interconnection Agreement, SBC notifies the CLEC of the dispute by sending a letter notifying the CLEC of the dispute type and the amount of the dispute.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum?  
**This dispute has not been escalated.**
3. Last known position of the opposing carrier. **Unknown.**
4. Were any bill adjustments made to resolve this issue? **Only minor if any credits received at all.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

**(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) SBC seeks credits from CLECs for disconnected circuits, for inappropriate rate elements and for charges greater than 120 days. Additionally, SBC seeks to have CLECs stop billing these inappropriate charges on a prospective basis.**

**(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)**

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.  
**Based on the limited information provided, and AT&T's review to date, the issue -- at least in regard to AT&T (TCG) -provided interconnection circuits**

in Wisconsin – is limited to an interconnection agreement dispute concerning the application of charges for interconnection facilities provided by AT&T to SBC. More specifically, AT&T applies charges per DS1 trunk group, while SBC claims that the charges should be applied per location, not per trunk group. AT&T believes the plain terms of its Wisconsin interconnection agreement with SBC makes clear that billing is to be done by trunk group. *See* Interconnection Agreement, Pricing Schedule, p. 14 (referring to “DS1 Collocation Termination Charges per DS1 (Per Trunk Group)” (emphasis added)).

AT&T is unaware of any significant problem in Wisconsin concerning AT&T billing SBC for interconnection circuits that have been disconnected. AT&T bills SBC for interconnection circuits based upon a comparison of SBC provided inventory reports. Such comparisons are generally done every six months, with credits and debits negotiated between the parties thereafter. For example, SBC would provide inventory on 12/01 and 6/02 and AT&T would then compare the two inventories and adjust billing accordingly. If SBC Wisconsin believes that AT&T is charging it for interconnection circuits that have been disconnected, AT&T would need SBC to identify the circuit and date of disconnect in order to fully investigate SBC’s claim. AT&T has asked for this information from SBC. As SBC is well aware, this is the manner in which AT&T has historically billed SBC for interconnection circuits (i.e., by a comparison between past and present SBC-provided inventory reports). As SBC is also aware, sometime in 2004 AT&T plans on implementing a process by which trunk orders will be tracked on a mechanized basis, thereby updating the manner in which AT&T bills SBC for interconnection circuits.

Finally, AT&T notes that in response to clarifying questions, SBC has indicated that this issue applies to TCG only, not AT&T Communications of Wisconsin, L.P.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

Yes. AT&T believes that SBC’s dispute – at least against AT&T (TCG)-- is entirely focused on the rates AT&T assesses SBC for interconnection circuits. As also explained above, this is an interconnection agreement interpretation issue. More specifically, AT&T applies charges per DS1 trunk group, while SBC claims that the charges should be applied per location, not per trunk group. The plain terms of the AT&T/SBC Wisconsin interconnection agreement support the manner in which AT&T applies these charges, i.e. by trunk group. *See* Interconnection Agreement, Pricing Schedule, p. 14 (referring to “DS1 Collocation Termination Charges per DS1 (Per Trunk Group)” (emphasis added)).

3. What performance measures can be implemented to monitor the desired system operation?

N/A

4. Any other pertinent information?

No.

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.

See above.

2. Were any bill adjustments made to resolve this issue?

**In December 2002, SBC brought a potential over-billing issue to AT&T's attention relating to Illinois and Ohio DS1 recurring charges. AT&T issued a credit to SBC concerning this dispute.**

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

**By February 2003 invoice.**

4. Identify any other carrier(s) known to have experienced similar problems.

**Unknown.**

5. Did you identify any other problems arising from or related to this issue?

No.

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).

**To better identify the basis of this SBC billing issue, AT&T asked SBC to provide further information relating to this issue, including an identification of the affected interconnection circuits and all correspondence between the parties concerning this issue. SBC has yet to provide all the information requested, including the circuits to which the dispute relates (if any).**

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

**Although not directly in response to this issue, AT&T notes that in 2004 it will begin to track trunk orders on a mechanized basis.**

Submitted by: *(Name of Carrier)*

**AT&T**

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-XXX-XXXX*

e-mail:

**David J. Chorzempa**

**Senior Attorney**

**(312) 230-3503**

**dchorzempa@att.com**

**Lori Furlong**

**732-420-8262**

**lfurlong@att.com**

Subject Matter Expert (SME): *(Name)*

**AT&T Response to SBC -1**

Telephone Number: (NPA)-NXX-XXXX  
e-mail:

**Jim Moore**  
**908-234-4287**  
**jimmoore2@att.com**

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: (NPA)-NXX-XXXX  
e-mail:

**Depending on the issue, same as persons noted, with counsel from client groups.**

Investigation into the Wholesale Billing Practices of  
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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- 1. Please complete a separate form for each issue.*
- 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
- 4. Please return to Nick Linden by e-mail ([nicholas.linden@psc.state.wi.us](mailto:nicholas.linden@psc.state.wi.us)) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: SBC

Contact: **Richelle Barker**  
Telephone Number: **(414)-227-6915**  
e-mail: **rb8434@sbc.com**

Subject Matter Expert (SME): **Brian Van Hoof**  
Telephone Number: **(414)-227-6981**  
e-mail: **bv3165@sbc.com**

Authorized Representative: **Brian Van Hoof**  
Telephone Number: **(414)-227-6981**  
e-mail: **bv3165@sbc.com**

Name: **Minute of Use Disputes**  
Brief Description: **CLECs have billed SBC for local and intralata toll minutes of use that did not originate from SBC end users. The total outstanding dispute is approximately \$12M. CLECs involved are:**  
**Northern Telephone and Data**  
**Net LEC**  
**ATT**

TCG  
MCI  
Time Warner  
KMC Telecom  
McLeod/Ovation  
TDS Metrocom  
Choice One  
CTC Communications  
Sprint

Please answer the following questions:

1. When this issue was first discovered? *11/1998*
2. How many occurrences and approximately over how long a period of time? *Monthly occurrence since 1998*
3. Is it a recurring problem? *Yes*
4. Your belief as to the cause of the problem. *Faulty CLEC billing system/logic that may not be removing UNE traffic, ported traffic or traffic originated by third parties from the minutes of use CLEC bills to SBC. Additionally, there is the potential that the CLEC billing systems could be using faulty logic in the creation of usage bills to SBC, such as billing SBC for connect time versus conversation time.*
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *This does not appear to be a contract or tariff issue to SBC. It appears to be more of a process issue with CLEC billing systems and processes.*
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? *Each month that SBC receives an invoice with inappropriate charges, in accordance with the Interconnection Agreement, SBC notifies the CLEC of the dispute by sending a letter notifying the CLEC of the dispute type and the amount of the dispute. In some cases, SBC has gone so far as to provide a month worth of call detail to CLECs to justify the amounts SBC has paid and disputed. In most of these cases where data has been exchanged, SBC has also helped the CLEC identify flaws in CLEC billing system logic as well as helped identify other carriers that are sending traffic to CLEC.*
2. Was this issue escalated for dispute resolution? If so, when and in what forum? *In many cases, the dispute has been escalated per the dispute resolution section of the ICA.*
3. Last known position of the opposing carrier. *In many cases, CLECs assert that since the traffic came over the SBC trunk groups, SBC has responsibility for compensating CLEC for such traffic, even though transit traffic may come over*

*the same trunk groups.*

4. Were any bill adjustments made to resolve this issue? *In some cases, adjustments have been made, but only after extensive analysis of CLEC billing systems and data exchanges.*
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) SBC seeks to have CLECs credit SBC for minutes of use that SBC has disputed because those minutes did not originate from SBC end users. SBC also requests that CLEC refrain from billing SBC for these minutes of use on all future invoices.*

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.

**Due to the generic nature of SBC's issue, and the limited information provided to date, AT&T cannot definitively determine the basis of SBC's issue with AT&T. AT&T therefore cannot conclude whether there is a problem or, if there is, its cause. Since March 2002, AT&T (TCG) has received monthly correspondence from SBC disputing AT&T's bills for local and intraLATA toll minutes. However, those letters do not clearly delineate the basis upon which SBC disputes these AT&T bills. SBC has only sent AT&T generic disputes on "local volume" issues. SBC has not sent AT&T any reports or call detail records that would allow AT&T to identify the nature or cause of SBC's issue.**

**The cause of SBC's dispute could be that SBC is being billed for traffic related to CLEC UNE customer usage (e.g., UNE-P). However, the source of this problem is SBC, not the CLECs. SBC's UNE-based traffic looks identical to AT&T as SBC-retail traffic. This is because SBC makes no effort whatsoever to distinguish this UNE traffic from SBC retail traffic. Carriers like AT&T, therefore, are justified in treating this traffic in the only manner they possibly can: as SBC traffic. SBC's "solution" is for carriers to trust SBC's rendition of the facts (and the amounts in dispute) and simply credit SBC for all claimed amounts. For obvious reasons, this is not satisfactory. Moreover, SBC has consistently rejected solutions to this problem. Solutions have been proposed in the context of OBF discussions, all of which have been rejected by SBC. These OBF solutions would include having SBC "tag" UNE calls with a code so that carriers could distinguish them as UNE calls and take the steps necessary to identify the UNE carrier.**

**Other than this UNE-traffic issue, AT&T does not bill SBC for traffic originated by third-parties or for transiting calls. AT&T has systems in place**

**to identify these calls as third-party calls. AT&T does bill SBC for calls placed by third parties for which SBC has identified itself as the primary toll carrier. SBC has supplied AT&T CIC codes associated with these carriers. In addition, AT&T provides SBC a separate invoice to identify this traffic.**

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

**No.**

3. What performance measures can be implemented to monitor the desired system operation?

**N/A**

4. Any other pertinent information?

**Yes. SBC claims this issue was first raised in 1998. It is unclear on what basis SBC makes this claim. Indeed, AT&T still is unsure concerning the scope or basis of the issue itself. Nevertheless, AT&T (TCG) notes that based on a previous settlement with SBC for Wisconsin, all SBC usage, invoices and disputes prior to March 31, 2002 are considered closed.**

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.

**See above.**

2. Were any bill adjustments made to resolve this issue?

**No.**

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

4. Identify any other carrier(s) known to have experienced similar problems.

**All CLECs.**

5. Did you identify any other problems arising from or related to this issue?

**No.**

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).

**AT&T has asked SBC to provide all correspondence between the parties relating to this issue.**

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

**No.**

Submitted by: *(Name of Carrier)*

**AT&T**

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**David J. Chorzempa**

**Senior Attorney**

**(312) 230-3503**



**dchorzempa@att.com**

**Donna Barnes/Janice Gallagher**  
**AT&T Carrier Billing Management**  
**732-420-6303/732-420-6121**  
**barnesda@att.com/janicegallagher@att.com**

**Casandra Bullock**  
**770-750-8085**  
**cbullock@att.com**

**Subject Matter Expert (SME): (Name)**  
**Telephone Number: (NPA)-NXX-XXXX**  
**e-mail:**

**Jim Moore**  
**908-234-4287**  
**jinmoore2@att.com**

**Authorized Representative: (Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)**  
**Telephone Number: (NPA)-NXX-XXXX**  
**e-mail:**

**Depending on the issue, same as persons noted above, with counsel from client groups.**

Investigation into the Wholesale Billing Practices of  
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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- 1. Please complete a separate form for each issue.*
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Submitted by: SBC

Contact: **Richelle Barker**  
Telephone Number: **(414)-227-6915**  
e-mail: **rb8434@sbc.com**

Subject Matter Expert (SME): **Carol Retzlaff**  
Telephone Number: **(414)273-8639**  
e-mail: **cr3741@sbc.com**

Authorized Representative: **Brian Van Hoof**  
Telephone Number: **(414)-227-6981**  
e-mail: **bv3165@sbc.com**

Name: **Facility Disputes**

**Brief Description:** *CLECs have incorrectly billed SBC charges associated with interconnection facilities. CLECs have billed SBC for circuits that have been disconnected. CLECs have billed inappropriate rate elements to SBC. Finally, CLECs have billed SBC beyond the 120 day back billing provision provided in the ICA. CLECs involved are:*

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1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail ([nicholas.linden@psc.state.wi.us](mailto:nicholas.linden@psc.state.wi.us)) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: SBC

Contact: **Richelle Barker**  
Telephone Number: **(414)-227-6915**  
e-mail: **rb8434@sbc.com**

Subject Matter Expert (SME): **Carol Retzlaff**  
Telephone Number: **(414)273-8639**  
e-mail: **cr3741@sbc.com**

Authorized Representative: **Brian Van Hoof**  
Telephone Number: **(414)-227-6981**  
e-mail: **bv3165@sbc.com**

Name: **Port Back Charges**

Brief Description: **CLECs are inappropriately billing SBC for charges associated with SBC's win or win back of end users even though the FCC has stated that cost recovery associated with portability must be competitively neutral. The CLECs have also attempted to circumvent the interconnection agreement by attempting to justify such charges in a tariff. SBC takes the position that a charge from a CLEC to SBC is not competitively neutral, not contained in the ICA and should not be charged to SBC.**

**AT&T/TCG  
ChoiceOne**

Please answer the following questions:

1. When this issue was first discovered? **12/2001**
2. How many occurrences and approximately over how long a period of time? **Multiple occurrences since 2001.**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **Improper interpretation of FCC Number Portability order/Interconnection agreement/tariff.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. **This issue relates to interpretation of the FCC order on the competitively neutral cost recovery of number portability charges as well as whether a CLEC can circumvent terms and conditions in the ICA by filing a tariff.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Medium**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Each month that SBC receives an invoice with inappropriate charges, in accordance with the Interconnection Agreement, SBC notifies the CLEC of the dispute by sending a letter notifying the CLEC of the dispute type and the amount of the dispute.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **In some cases, the dispute has been escalated per the dispute resolution section of the ICA**
3. Last known position of the opposing carrier. **CLECs believe that there is some cost that CLECs are entitled to recover from SBC associated with porting numbers/porting numbers back to SBC even though such costs were not part of the ICA and are not in line with FCC portability cost recovery order.**
4. Were any bill adjustments made to resolve this issue? **Only minor if any credits received at all.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

**(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) SBC seeks credits from carriers that have inappropriately billed SBC for charges associated with number portability or customer transfer charges. Additionally, SBC also seeks to have the CLECs refrain from billing such charges in the future. Finally, SBC would like CLECs to remove such charges from any CLEC tariffs.**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.

**AT&T (TCG) disagrees that any problem exists.**

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

**AT&T believes it is lawfully entitled to assess its porting charges pursuant to applicable law and AT&T's governing tariff(s), which have been in place since November 2002.**

**AT&T incurs costs when transferring AT&T customers to SBC. That work is done for the benefit of SBC.**

3. What performance measures can be implemented to monitor the desired system operation?

**N/A**

4. Any other pertinent information?

**This issue was raised by SBC in November 2002, not December 2001 as SBC claims. In addition, a conference call (initiated by AT&T) took place between the parties on this issue in July 2003, over six months after the effective date of the applicable AT&T tariffs.**

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.

**On the July 2003 conference call identified above, the parties discussed this issue, but the parties came to no resolution.**

2. Were any bill adjustments made to resolve this issue?

**No.**

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

**N/A**

4. Identify any other carrier(s) known to have experienced similar problems.

**Unknown.**

5. Did you identify any other problems arising from or related to this issue?

**No.**

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).

**In the context of this case, AT&T asked SBC to provide all correspondence between the parties relating to this issue.**

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

**No.**

Submitted by: *(Name of Carrier)*

**AT&T**

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-XXX-XXXX*

e-mail:

**David J. Chorzempa**

**(312) 230-3503**

**dchorzempa@att.com**

**Dana Goss**

**AT&T Carrier Billing Management**

**732-420-6303/732-420-6121**

**dgoss@att.com**

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-XXX-XXXX*

e-mail:

**John McAuliffe-Product Manager for CTC Charges**

**732-420-4787**

**jmcauliffe@att.com**

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-XXX-XXXX*

e-mail:

**Depending on the issue, same as persons noted above, with counsel from client groups.**

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- 1. Please complete a separate form for each issue.*
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- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
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Submitted by: SBC

Contact: **Richelle Barker**  
Telephone Number: **(414)-227-6915**  
e-mail: **rb8434@sbc.com**

Subject Matter Expert (SME): **Brian Van Hoof**  
Telephone Number: **(414)-227-6981**  
e-mail: **bv3165@sbc.com**

Authorized Representative: **Brian Van Hoof**  
Telephone Number: **(414)-227-6981**  
e-mail: **bv3165@sbc.com**

Name: **Rate Disputes**  
Brief Description: **CLECs have billed SBC incorrect rates for both local and intraLata toll usage. The outstanding dispute amounts for local rate disputes is approximately \$.3M and \$.7M for intraLata toll rate disputes. CLECs that have billed incorrect rates include:**  
**Northern Telephone & Data**  
**Net Lec**

**TCG  
Time Warner  
KMC  
McLeod/Ovation  
TDS  
Choice One  
CTC Communications**

Please answer the following questions:

1. When this issue was first discovered? **7/1998**
2. How many occurrences and approximately over how long a period of time? **Monthly occurrence since 1998**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **Inaccurate CLEC interpretation/application of the interconnection agreement or tariff.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Low Priority**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Each month that SBC receives an invoice with inappropriate charges, in accordance with the Interconnection Agreement, SBC notifies the CLEC of the dispute by sending a letter notifying the CLEC of the dispute type and the amount of the dispute.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **In some cases, SBC has invoked informal and or formal dispute resolution with the CLEC in an attempt to resolve. The notification of escalation would have been done in accordance with the ICA and would have been via letter or email.**
3. Last known position of the opposing carrier. **Unknown in many cases.**
4. Were any bill adjustments made to resolve this issue? **Only minor if any credits received at all.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

***(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) SBC seeks credits from the CLECs that have billed SBC at incorrect local and intralata toll rates on an historic basis. Additionally, SBC seeks to have the CLECs correct the incorrect rates to avoid such disputes on prospective bills from the CLECs. Finally, SBC seeks to have carriers charge SBC an intralata toll rate that is no higher than the SBC access rate, unless a CLEC cost study proves a higher rate.***



*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.

**AT&T (TCG) denies there is a problem.**

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

**Through questioning of SBC, TCG has confirmed that this issue relates solely to the level of TCG's tariffed access charges. TCG's access charges are appropriate and lawful.**

3. What performance measures can be implemented to monitor the desired system operation?

**N/A**

4. Any other pertinent information?

**To date, TCG has no record of any SBC dispute letters concerning local or toll rates for the state of Wisconsin.**

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.

**See above.**

2. Were any bill adjustments made to resolve this issue?

**No.**

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

**N/A**

4. Identify any other carrier(s) known to have experienced similar problems.

**Unknown.**

5. Did you identify any other problems arising from or related to this issue?

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).

**AT&T's investigation continues and AT&T will update the parties with any other billing issues related to this issue.**

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

**No.**

Submitted by: *(Name of Carrier)*

**AT&T (TCG)**

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**David J. Chorzempa**

**(312) 230-3503**

**dchorzempa@att.com**

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**Jim Moore**

**908-234-4287**

**jmmoore2@att.com**

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**Depending on the issue, same as persons noted above, with counsel from client groups.**